

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN I. GEHRICH, ROBERT LUND,
COREY GOLDSTEIN, PAUL STEMPLER and
CARRIE COUSER, individually and
on behalf of themselves and others similarly
situated,

Plaintiffs,

v.

CHASE BANK USA, N.A., and JPMORGAN
CHASE BANK, N.A.,

Defendants.

No. 1:12-CV-5510

Honorable Gary Feinerman

**JOINT MOTION TO EXTEND TIME TO FILE MOTION FOR
FINAL APPROVAL OF THE SETTLEMENT AND RESPONSES TO OBJECTIONS**

Plaintiffs, Robert Lund, Corey Goldstein, Paul Stemple, Carrie Couser, and Jonathan Gehrich (together, the “Plaintiffs”), on behalf of themselves and the Settlement Class, and Defendants, Chase Bank USA, N.A. and JPMorgan Chase Bank, N.A. (together, “Chase” and together with Plaintiffs, the “Parties”), by and through their undersigned counsel, respectfully jointly move the Court for an extension of time to file Plaintiffs’ motion for final approval of the Settlement and the Parties’ responses to objections to the Settlement in connection with the Court’s consideration of the Settlement preliminarily approved by the Court on August 12, 2014 (Dkt. 117). In support hereof, the Parties state as follows:

1. On August 12, 2014, the Court entered an Order (“Preliminary Approval Order”) preliminarily approving a class action settlement of all claims asserted in this litigation. (Dkt. 117.)

2. In its Preliminary Approval Order, the Court approved the Notice Plan (as that term is defined in the Settlement Agreement and Release) and appointed Garden City Group (“GCG”) as the Claims Administrator. (Dkt. 117 ¶¶ 9-10.)

3. In addition, the Court set various deadlines, including a deadline of February 9, 2015 for Settlement Class Members to file objections to the Settlement and a deadline of March 5, 2015 for the Parties to file a motion for final approval of the Settlement and to respond to any objections to the Settlement. (Dkt. 117 ¶¶ 15, 27.) The Court also scheduled a final fairness hearing for March 19, 2015. (Dkt. 117 ¶ 27.)

4. GCG recently informed the Parties of a potential issue concerning implementation of the Notice Plan that the Parties are in the process of investigating and resolving. As a result, the Parties jointly request that the deadline for filing a motion for final approval of the Settlement and responses to objections to the Settlement (currently set for March 5, 2015) be extended until such further time as the Court deems necessary and appropriate based on the information that will be presented by the Parties at the hearing scheduled for this matter. Resolution of these issues likely will require delay of the final fairness hearing.

WHEREFORE, the Parties jointly request that the Court extend the time to file a motion for final approval of the Settlement and responses to objections to the Settlement until such further time as the Court deems necessary and appropriate based on the information that will be presented by the Parties at the hearing on this matter.

Respectfully submitted,

By: /s/ Alexander H. Burke

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CERTIFICATE OF SERVICE

I, Kenneth M. Kliebard, an attorney, certify that I filed the foregoing **JOINT MOTION TO EXTEND TIME TO FILE MOTION FOR FINAL APPROVAL OF THE SETTLEMENT AND RESPONSES TO OBJECTIONS TO THE SETTLEMENT** via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record, this 4th day of March, 2015.

s/ Kenneth M. Kliebard

Kenneth M. Kliebard